



ALASKA AIR CARRIERS ASSOCIATION

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May 15, 2006

Mr. Kevin Gardner
U.S. Army Garrison Alaska
724 Postal Service Loop #4500
Attention: LMPA-FRA-PWE (Gardner)
Fort Richardson, AK 99505-4500

Re: Supplemental Draft Environmental Impact Statement (SDEIS) for the construction and operation of a Battle Area Complex (BAX) and a Combined Anus Collective Training Facility (CACTF) within U.S. Army training lands in Alaska.

Dear Mr. Gardner:

The Alaska Air Carriers Association (AACA) is a trade organization promoting aviation safety and supporting industry businesses in Alaska. The Association's membership includes over 77 air taxis, commuter air carriers, and Part 121 airlines operating in Alaska. Another 73 associate members represent various related aviation businesses such as aircraft and avionics manufacturers, suppliers, insurers, and others.

The Alaska Air Carriers Association thanks the U. S. Army for the opportunity to submit the following comments regarding the SDEIS for the construction and operation of a BAX and a CACTF within U.S. Army Training Lands in Alaska. AACA supports Alternative 4 as it would have the least impact on the general aviation (GA) and commercial community, and would contain the controlled firing area (CFA) and unmanned aerial vehicle (UAV) operations within the North Texas Range restricted area, having less overall impact on the Army's training needs as they would not be forced to cease fire with each civilian overflight operation.

Under the Army's current preferred alternative, it does not appear that a full analysis of overflight impacts on training activities at the BAX and CACTF has been conducted. Based on the fact that a CFA requires that live-fire activities are halted when a non-participating aircraft is observed, the Army activities may have to be stopped many times an hour during peak flying season, especially given that the proposed training area partially underlies two major air traffic corridors. When combined with the required weather minimums needed to conduct live-fire exercises, AACA is concerned a CFA located at Delta Junction will not adequately meet the Army's training needs for the future. Aviation pilots in Alaska are very familiar with the current restricted area that overlies the North Texas Range site location associated with alternative 4 and understand it would not require the Army to cease firing activities each time an aircraft passes or the weather goes below mandated minimums.

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Though the Army has formally indicated they will not seek additional restricted airspace for live-fire activities in the future, AACA remains concerned that the Army has not fully addressed the impacts of overflight operations on their training mission at the current preferred site location. Any future restricted airspace proposals will be staunchly opposed, given the large amount of restricted airspace in close proximity to the current proposed SAX and CACTF areas that AACA recommends be utilized.

The Army's proposed use of UAVs in the MX and CACTF are a major concern to AACA. Due to the heavy amount of GA and commercial traffic that uses the corridor above the proposed training area; the introduction of UAVs is a major safety of flight issue for pilots. Furthermore, given that current Federal Aviation Administration (FAA) policy requires a certificate of authorization (COA) to operate UAVs outside of special use airspace for transit purposes only, AACA contends that the Army's preferred alternative site will not allow the use of UAV operations. However, under alternative 4, the use of UAVs would not be an issue, as UAV operations would be contained within the current restricted airspace.

AACA anticipates the implementation of the Army's plans to integrate the Special Use Airspace Information Service into the operation of the proposed facility. This service has proved positive for both civil and military users, and AACA anticipates the Army will yield similar benefits and continued use of this valuable service.

The Alaska Air Carriers Association looks forward to further discussions with the Army and thanks them for the opportunity to comment on the SDEIS.

Sincerely,

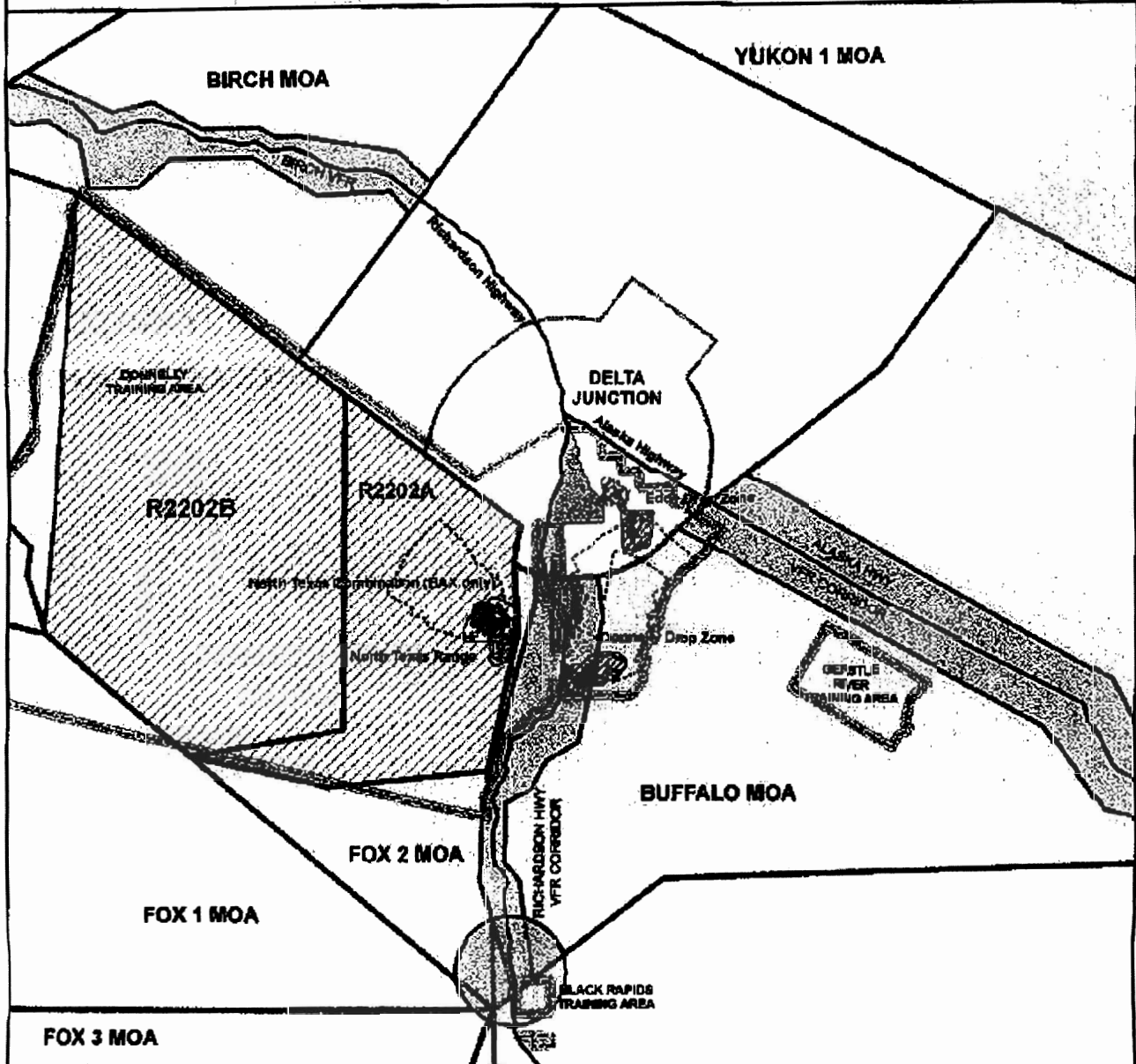


Karen Casanovas

cc: File
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Figure 3.k

Airspace for Donnelly Training Area



Legend

- | | | | |
|--|-----------------------|--|-----------------------------------|
| | Installation Boundary | | Military Operations Area (MOA) |
| | Fort Greely | | MOA Exclusion Area (VFR Corridor) |
| | FAA Class D | | Primary Road |
| | Restricted Airspace | | |

* Note that North Texas Combination incorporates the Eddy Drop Zone CACTF as well

Scale: 1:625,000

